IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

LARRY LAYMON,

    Plaintiff,

v.   No. 1:05-cv-00193

THE CANADA LIFE ASSURANCE
COMPANY,

    Defendant.

MOTION FOR EXTENSION OF TIME IN WHICH TO FILE A RESPONSIVE PLEADING

AND NOW, comes The Canada Life Assurance Company (hereinafter "Canada Life"), by and through its attorneys, Jones, Gregg, Creehan & Gerace, LLP, and files the following Motion for Extension of Time in which to File a Responsive Pleading:

1.   On May 20, 2005, a Complaint was filed against Canada Life in the Court of Common Pleas of Erie County.

2.   Canada Life filed a Notice of Removal on June 21, 2005, and on July 8, 2005, filed a Motion to Dismiss Plaintiff's Complaint, together with a Brief in Support.

3.   Plaintiff's Amended Complaint was filed on September 14, 2005 and, pursuant to Federal Rule of Civil Procedure 15, Canada Life's Responsive Pleading must be filed by September 26, 2005.

No. 1:05-cv-00193

4.   Canada Life Requests, and Plaintiff does not object to, an extension of time until October 14, 2005 in which to file a Responsive Pleading.

WHEREFORE, Canada Life requests an Order be entered in the form attached hereto granting its Request for Extension of Time in which to File a Responsive Pleading until October 14, 2005.

Respectfully Submitted,

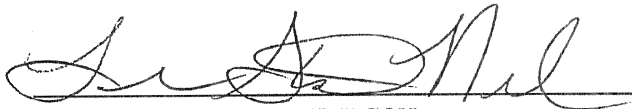JONES, GREGG, CREEHAN & GERACE, LLP

BY: _____
JOHN P. DAVIS, III
PA ID. NO. 33294

ATTORNEY FOR DEFENDANT,
THE CANADA LIFE ASSURANCE COMPANY

CONSENTED TO BY:

_____
LAURA STEEHLER NELSON

ATTORNEY FOR PLAINTIFF,
LARRY LAYMON

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing **MOTION FOR EXTENSION OF TIME IN WHICH TO FILE A RESPONSIVE PLEADING** has been furnished via Email this 21st day of September 2005, to:

LAURA STEEHLER NELSON, ESQUIRE
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BY: _____
       JOHN P. DAVIS, III
       PA ID. NO. 33294

       ATTORNEY FOR DEFENDANT,
       THE CANADA LIFE ASSURANCE COMPANY